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August 14, 2002

**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., TW-B204  
Washington, D.C. 20554

*Re: Application of Qwest Communications International, Inc.  
To Provide In-Region InterLATA Services in the States of Colorado,  
Idaho, Iowa, Nebraska and North Dakota, WC Docket No. 02-148*

*Application of Qwest Communications International, Inc.  
To Provide In-Region InterLATA Services in the States of Montana,  
Utah, Washington & Wyoming, WC Docket No. 02-189*

Dear Ms. Dortch:

Qwest hereby responds to questions from the Wireline Competition Bureau concerning the following topics: training provided by Qwest for service delivery coordinators to ensure that LSRs that drop out for manual processing are processed correctly, the unbundled local switching exception, DSL disconnects and certain service outages.

The twenty-page limit does not apply as set forth in DA 02-1390 and DA 02-1666.

Sincerely,

*Hance Haney sk7*

cc: M. Carowitz  
E. Yockus  
G. Remondino  
M. Cohen  
R. Harsch  
J. Jewel  
P. Baker  
C. Post

P. Fahn  
B. Smith  
J. Myles  
J. Stanley  
S. Vick  
J. Orchard  
C. Washburn  
S. Oxley

**QUESTION:**

Provide more details concerning the training described in para. 88 of the Notarianni-Doherty Reply Declaration.

**RESPONSE:**

Qwest provides focused training to its center personnel. The following facts for the first six months of 2002 are evidence of Qwest's commitment.

- Qwest delivered more than 350 instructor-led employee training classes.
- The instructors delivered 3,344.25 hours of training.
- 5,603 Qwest students attended these classes receiving more than 15,000 hours of training (this number represents total number of attendees for all classes; one person could have attended multiple classes.)
- There have been 1,286 employee visits to web-based training classes.
- 28 courses have been developed or updated.

The training classes provided covered a wide range of topics. The classes and the class dates are detailed on an attachment.

## Attachment

Training  
Classes

Course	Date	Students
Annual Compliance		
	02/13/2002	73
Billing - Unbundled Loop		
	05/23/2002	4
	05/24/2002	3
	05/31/2002	3
	06/03/2002	4
Billing Foundations		
	01/08/2002	5
	01/15/2002	1
billing sdc foundations		
	01/08/2002	5
	01/15/2002	1
BOSS, CARS and SOPs for Service Managers		
	04/10/2002	23
	04/11/2002	9
	04/12/2002	28
	04/23/2002	8
	06/05/2002	2
BOSS/CARS/RSOLA R		
	06/17/2002	2
CCMD 3.0		
	01/18/2002	4
CCSAC/SS7 ASR Customer Trainin		
	01/03/2002	6
	02/26/2002	2
Centrex Systems Product Training		
	07/12/2002	1
	07/22/2002	1
clec jeopardy notification		
	02/13/2002	1
clec jeopardy notification		
	02/13/2002	25
	02/14/2002	16
Completions (CP)		
	01/04/2002	2

	03/05/2002	2
	03/07/2002	1
	03/22/2002	2
	03/26/2002	1
CSR		
	04/10/2002	1
Customer Request Management (CRM)		
	03/22/2002	8
	04/12/2002	10
Customer Service Inquiry and Education (CSIE)- Escalations		
	03/11/2002	6
	03/12/2002	5
	03/13/2002	5
	03/14/2002	5
	03/15/2002	5
	03/18/2002	5
	03/19/2002	5
	03/20/2002	5
	03/21/2002	5
	03/25/2002	3
	03/26/2002	3
	03/27/2002	4
	03/28/2002	4
	04/01/2002	2
	04/02/2002	2
	04/03/2002	3
	04/04/2002	2
	04/05/2002	2
	04/19/2002	5
	06/19/2002	1
	06/24/2002	1
	07/10/2002	2
	07/25/2002	1
	07/26/2002	1
DS3 Switched USOCS		
	02/15/2002	5
Errors (Center prepared materials)		
	01/18/2002	1
	03/22/2002	1
	04/26/2002	1
EXACT Training for Service Managers		
	06/10/2002	12

	06/11/2002	8
	06/28/2002	2
<b>Frame Relay Provisioning</b>		
	02/15/2002	3
	03/08/2002	2
	03/21/2002	1
	03/27/2002	2
	04/16/2002	3
	06/10/2002	2
	06/17/2002	3
	06/18/2002	1
	06/24/2002	1
<b>IMA 10.0 Enhancements</b>		
	06/17/2002	3
	06/20/2002	1
<b>IMA 10.00 Enhancement Training</b>		
	06/12/2002	1
	05/22/2002	69
	06/11/2002	8
	06/12/2002	10
	06/13/2002	5
	07/10/2002	1
	07/12/2002	1
	07/22/2002	1
<b>InfoBuddy</b>		
	01/14/2002	8
	01/15/2002	8
	01/16/2002	8
	01/17/2002	8
	01/22/2002	9
	01/23/2002	8
	01/24/2002	7
	01/29/2002	8
	07/16/2002	15
<b>InfoBuddy Training</b>		
	07/17/2002	11
	07/19/2002	7
	07/22/2002	1
<b>INITIAL SYSTEMS</b>		
	04/05/2002	15
	04/17/2002	3
<b>INITIAL SYSTEMS</b>		
	04/17/2002	1

<b>INITIAL SYSTEMS</b>		
	04/18/2002	1
<b>Initial Systems Training</b>		
	04/17/2002	5
	04/22/2002	9
<b>Interconnect Imaging Solutions (IIS)</b>		
	01/24/2002	1
<b>ISC SWIFT / SOSE Training</b>		
	06/05/2002	1
	07/29/2002	5
<b>ISDN/PRI Billing</b>		
	06/05/2002	11
	06/06/2002	13
	06/07/2002	15
	06/21/2002	5
<b>listings</b>		
	02/20/2002	19
	02/28/2002	16
	03/01/2002	11
<b>Listings Training</b>		
	07/22/2002	1
<b>LOTUS Notes</b>		
	06/04/2002	1
	06/10/2002	3
	06/12/2002	1
<b>post completion</b>		
	05/07/2002	34
<b>PPTD - Project Plan Test Date</b>		
	02/22/2002	16
	03/06/2002	22
	03/07/2002	55
	03/08/2002	3
	03/10/2002	1
	03/15/2002	9
<b>QPAP (Qwest Performance Assurance Plans)</b>		
	07/30/2002	1
	07/23/2002	54
	07/24/2002	29
	07/30/2002	253
	07/31/2002	117
	08/06/2002	101
	08/07/2002	227



<b>Qwest 101 for Service Managers</b>		
	02/28/2002	9
	04/25/2002	11
<b>Qwest DSL Provisioning</b>		
	07/12/2002	1
<b>Service Order Overview - Service Order Components</b>		
	03/28/2002	11
<b>Shared Loop Billing and Provisioning</b>		
	02/21/2002	1
<b>Shared Loop Training Materials</b>		
	01/09/2002	1
	01/14/2002	1
	01/28/2002	1
<b>SS7</b>		
	04/09/2002	6
<b>TIRKS System Overview for Service Managers</b>		
	04/26/2002	9
<b>Training Administration for Data Specialists</b>		
	07/01/2002	6
	07/02/2002	16
<b>UBL Provisioning Training</b>		
	04/30/2002	1
	05/10/2002	4
	05/24/2002	4
	06/03/2002	4
	06/05/2002	1
	06/07/2002	3
	06/18/2002	2
	06/20/2002	1
<b>UNE-P &amp; C Product Training</b>		
	01/18/2002	4
	06/18/2002	1
	07/02/2002	3
	07/03/2002	1
	07/08/2002	4
	07/09/2002	4
	07/10/2002	1

	07/11/2002	5
	07/12/2002	6
	07/23/2002	6
	07/25/2002	5
	07/26/2002	1
UNE-P Method Training		
	02/26/2002	6
	03/18/2002	5
	03/19/2002	5
Wireless Private Line		
	04/02/2002	2
Wireless Type 2		
	04/03/2002	2
<b>Total Hours--</b> <b>5,852.97 Total</b> <b>Students--1795</b>		

#### Short Subjects

Short Subject	Date	Students
271 Database		
	07/10/2002	3
272 Review Requirments		
	02/05/2002	2
	02/14/2002	2
	02/18/2002	1
	02/20/2002	1
	02/25/2002	12
	02/26/2002	15
	02/28/2002	28
	03/07/2002	20
	06/27/2002	1
admin training database		
	04/04/2002	4
	05/29/2002	1
	05/31/2002	2
AQCB System		
	04/05/2002	1
	04/08/2002	42
	04/09/2002	56
	04/11/2002	64
	04/26/2002	3
ASR Order Writing Rules		
	05/08/2002	24

Billing Feedback Form		
	02/01/2002	11
	02/13/2002	10
	03/19/2002	2
BOSS CARS ADJUSTMENTS		
	04/25/2002	8
	04/26/2002	8
BOSS Eastern		
	02/22/2002	1
	04/09/2002	1
Broker Transition		
	06/07/2002	1
Call Handling		
	04/22/2002	89
	04/29/2002	4
Change Management Process (CMP)		
	05/03/2002	1
	05/09/2002	2
	05/13/2002	1
	07/05/2002	1
Change Management Process (CMP) Mod 2		
	05/01/2002	1
	05/02/2002	1
	05/10/2002	16
	05/13/2002	1
	05/22/2002	1
	04/30/2002	3
	05/01/2002	57
	05/02/2002	27
	05/03/2002	19
	05/06/2002	9
	05/07/2002	20
	05/08/2002	6
	05/09/2002	3
	05/10/2002	56
	05/13/2002	3
	05/14/2002	1
	05/16/2002	3
	05/22/2002	1
	05/29/2002	22
	06/05/2002	1
Change Management Process (CMP) Mod		

3		
	05/16/2002	1
	07/05/2002	1
	07/08/2002	4
	07/11/2002	1
	07/15/2002	1
	07/19/2002	1
	07/24/2002	1
Change Management Process (CMP) Mod 4		
	05/16/2002	1
	06/04/2002	1
	06/25/2002	1
	06/26/2002	1
	06/28/2002	2
CLEC Documentation Management training		
	02/19/2002	6
	02/20/2002	4
	02/21/2002	10
CLEC Notification		
	03/01/2002	15
	03/11/2002	7
	03/25/2002	1
Code of Conduct		
	02/07/2002	11
	02/08/2002	23
	02/11/2002	1
	02/14/2002	1
	02/15/2002	24
	02/16/2002	1
	02/18/2002	1
	02/21/2002	3
	02/28/2002	51
	06/27/2002	1
Collections Live - Wholesale M&P		
	03/06/2002	8
	04/05/2002	1
	04/18/2002	3
CPX Resale		
	01/21/2002	13
	06/24/2002	1
dispute tracking tool		
	06/19/2002	11
	06/20/2002	25

	06/24/2002	12
	06/25/2002	6
	06/26/2002	18
Disputes CRIS M&P		
	04/09/2002	1
Emergency Response Program		
	06/19/2002	2
	06/17/2002	8
	06/19/2002	5
	06/20/2002	17
	06/24/2002	30
ERROR TRNG		
	05/17/2002	4
	05/19/2002	2
	06/28/2002	1
Frame Relay		
	04/10/2002	6
	04/30/2002	6
	05/01/2002	10
	05/02/2002	5
	05/03/2002	5
	05/06/2002	4
	05/07/2002	6
	05/08/2002	6
	05/09/2002	5
	05/10/2002	5
	05/13/2002	5
	05/14/2002	6
	05/15/2002	5
	05/16/2002	7
	05/17/2002	7
FRSR		
	07/11/2002	3
FUSF Exemption Process		
	02/01/2002	1
	02/26/2002	20
IBV Trained from M&P		
	03/04/2002	9
IMA 10.0		
	05/09/2002	74
	06/11/2002	1
	06/13/2002	52
	06/18/2002	12
IMA 9.0 Release -		

SDC		
	01/29/2002	3
	01/30/2002	1
	02/20/2002	26
	02/21/2002	74
	02/26/2002	5
	03/20/2002	3
IMA Help Desk		
	05/23/2002	15
IMA Release 9.01 - SDC		
	03/19/2002	11
	03/20/2002	13
	03/21/2002	7
	03/22/2002	8
InfoBuddy Training		
	02/27/2002	8
	02/28/2002	4
	03/01/2002	7
	04/05/2002	4
	04/09/2002	40
	06/27/2002	1
	07/08/2002	14
	07/09/2002	27
	07/10/2002	24
	07/15/2002	10
	07/17/2002	17
	07/19/2002	7
INTERLCA		
	05/01/2002	13
Internet Explorer		
	08/09/2002	1
ISDN-PRI Qwest Project		
	05/17/2002	8
	07/09/2002	2
Jeopardy Notice Reject Process		
	02/14/2002	151
	02/18/2002	6
	02/20/2002	3
	02/25/2002	1
	06/17/2002	19
Line Sharing (Shared Loop)		
	04/26/2002	1
	07/02/2002	10

<b>Listings</b>		
	01/28/2002	6
	01/29/2002	5
	01/30/2002	7
	02/27/2002	10
	03/04/2002	1
	03/15/2002	2
	06/11/2002	1
	06/12/2002	15
	06/13/2002	7
	06/14/2002	10
	06/17/2002	5
	06/18/2002	9
	06/19/2002	9
	06/20/2002	9
	06/24/2002	7
<b>LNP Reject Reasons</b>		
	01/04/2002	20
	01/07/2002	13
	01/09/2002	12
	01/10/2002	5
	01/21/2002	1
<b>Loss &amp; Completions</b>		
	01/31/2002	4
<b>Lotus Notes</b>		
	06/24/2002	1
<b>LSOG</b>		
	03/26/2002	2
	04/09/2002	14
	04/10/2002	11
	04/11/2002	12
	04/12/2002	7
<b>LSR Reject Procedures</b>		
	01/14/2002	16
<b>LTR - Billing</b>		
	01/31/2002	1
	03/05/2002	5
	04/23/2002	21
<b>Management Masters Concordia U</b>		
	05/13/2002	1
<b>Management Masters Concordia Univ 2nd Qtr</b>		
	06/20/2002	1
<b>MBSS Managed</b>		

Bandwidth SONET Service		
	06/06/2002	7
Microsoft Excel		
	04/03/2002	4
	04/08/2002	1
	08/07/2002	1
Microsoft Word		
	04/02/2002	5
	07/26/2002	1
Navigator		
	05/20/2002	16
Nesting UBL		
	05/03/2002	1
NetCalendar		
	01/02/2002	2
	03/26/2002	2
	03/28/2002	5
	04/01/2002	3
NetMeeting		
	06/27/2002	1
	07/26/2002	1
Non-Recurring Job Aid		
	02/14/2002	1
	03/14/2002	12
	03/15/2002	10
Number Pooling		
	01/10/2002	61
	01/17/2002	2
	01/29/2002	67
	01/30/2002	19
Order Writing - Eastern		
	01/22/2002	1
OSCAR		
	04/04/2002	1
PITT Tickets Searching & Creating		
	01/16/2002	4
	01/17/2002	2
PLT		
	07/12/2002	4
	07/19/2002	3
Predictor Foundations		
	03/13/2002	5
Private Line		



(Meetpoint)		
	03/29/2002	5
	04/05/2002	3
	04/10/2002	3
Private Line (SRS)		
	04/12/2002	6
Reserved Number Blocks		
	08/07/2002	1
Retail Roster		
	04/01/2002	1
	04/05/2002	1
Safety Training		
	01/07/2002	2
	01/08/2002	3
	01/18/2002	19
	01/29/2002	1
	02/11/2002	74
	02/12/2002	26
	02/13/2002	9
	02/14/2002	13
	02/15/2002	4
	02/17/2002	13
	02/18/2002	9
	02/19/2002	3
	02/20/2002	1
	02/21/2002	26
	02/22/2002	5
	02/25/2002	12
	02/26/2002	39
	02/27/2002	19
	02/28/2002	23
	03/04/2002	1
	03/13/2002	2
	03/14/2002	5
	03/16/2002	3
	05/30/2002	97
	06/17/2002	1
	06/25/2002	50
	06/26/2002	27
	06/27/2002	18
	07/19/2002	4
screening		
	02/25/2002	8
	04/22/2002	4
Sizzle or Fizzle		

	02/21/2002	4
SLC Provisioning Order Writing Review		
	07/26/2002	18
SOAC		
	01/15/2002	57
	01/16/2002	6
SOLAR SYSTEM		
	04/18/2002	9
	04/23/2002	9
	07/22/2002	2
SPOP Single Point of Presence		
	06/18/2002	6
SS7 Overview		
	02/26/2002	14
	02/27/2002	15
Surviving Change In The New World Of Work		
	02/05/2002	28
Switched CSR Validation		
	03/07/2002	3
	03/08/2002	3
	03/13/2002	4
	03/14/2002	3
Switched vs Private Line - Overview		
	02/13/2002	5
systems		
	01/16/2002	11
	03/01/2002	9
Tag Training		
	05/24/2002	9
	05/30/2002	1
TIRKS Navigation		
	07/23/2002	1
TV Circuits		
	06/11/2002	1
Ubl/Shared Loop for Billing		
	02/06/2002	5
	02/07/2002	13
	04/11/2002	1
	05/09/2002	4
	05/21/2002	5
UDIT		

	03/05/2002	6
Unbundled Loop		
	07/18/2002	16
	07/19/2002	1
	07/22/2002	1
UNE-P Centrex 21		
	05/16/2002	8
	07/30/2002	5
UNE-P Method Training		
	05/07/2002	19
	08/05/2002	1
Using Qwest LSOG		
	04/09/2002	14
	04/10/2002	12
	04/11/2002	11
	04/12/2002	9
WLI - WORKING LEFT IN		
	01/17/2002	4
	01/24/2002	1
	01/31/2002	1
	02/05/2002	1
Workback (CSIE)		
	01/18/2002	2
	03/01/2002	1
X/PTR		
	03/25/2002	1
	03/29/2002	1
	05/20/2002	1
You Can Training		
	06/24/2002	3
Zap Correction		
	01/03/2002	1
	03/01/2002	6
	03/05/2002	1
	04/19/2002	6
	04/24/2002	7
	07/23/2002	1
<b>Total Hours--</b> <b>9,286.44 Total</b> <b>Students--3241</b>		
<b>Total Student Hours</b>	<b>15,140.41</b>	



**QUESTION:**

Has Qwest invoked the switching exception to deny carriers access to unbundled local switching or the unbundled local switching component of UNE-P? Where does Qwest say that it will offer unbundled local switching in the exempt wire centers? Where does Qwest say that it reserves the right to charge market-based rates?

**RESPONSE:**

Qwest has not invoked the unbundled local switching (UBS) exception to deny any CLEC access to UBS and/or UNE-P combination service. However, Qwest reserves the right to charge market-based rates for UBS as allowed by the FCC.

Qwest's SGATs provide as follows (excerpt below is from the Colorado SGAT) concerning the application of market-based rates for UBS, including UBS that is included with UNE-P combinations.

9.11.2.5 Unbundled local switching does not constitute a UNE, and is therefore not available at UNE rates, when CLECs End User Customer to be served with Unbundled Local Switching has four (4) access lines or more and the lines are located in density zone 1 in specified Metropolitan Statistical Areas (MSAs). Unbundled local switching is available at market-based rates when CLECs End User Customer to be served with Unbundled Local Switching has four (4) or more access lines and the lines are located in density zone 1 in specified MSAs. This exception applies to density zone 1 as it was defined by Qwest on January 1, 1999.

9.11.2.5.1 For the purposes of the above paragraph, the following Wire Centers constitute density zone 1 in each of the specified MSAs:

MSA	CLLI	Wire Center Name
Denver	DNVRCOCH	Capitol Hill
	DNVRCOCP	Curtis Park
	DNVRCODC	Dry Creek
	DNVRCOMA	Denver Main
	DNVRCONA	Denver North

9.11.2.5.1.1 For End User Customers located within the Wire Center specified above, CLEC will determine whether End User Customers it intends to serve with UNEs have four access lines or more in advance of submitting an order to Qwest for Unbundled Local Switching at UNE rates. If the End User Customer is served by four access lines or more, CLEC will not submit an order to Qwest for Unbundled Local Switching at UNE rates.

9.11.2.5.2 This exclusion will be calculated using the number of DS0-equivalent access lines CLEC intends to serve an End User Customer within a Wire Center specified above.

- 9.11.2.5.3 This exclusion will not apply in Wire Centers where Qwest has held orders for transmission facilities needed for EELs or where CLECs are unable to obtain sufficient Collocation space to terminate EELs.
- 9.11.2.5.4 Only dial-tone lines shall be used in counting the exclusion. Private line type data lines, alarm or security lines, or any other type of non-dial-tone lines shall not be used in the count.
- 9.11.2.5.5 The high frequency portion of a Loop shall not count as a second line.
- 9.11.2.5.6 End-user Customers shall be considered individually in MDU buildings or any other multiple use or high-rise building or campus configuration, as long as they are individually billed as the Customer of record.
- 9.11.2.5.7 CLEC may order new Unbundled Local Switching or UNE-P Combinations in quantities that exceed three (3). If CLEC orders four (4) or more such Unbundled Local Switching elements or UNE-P Combinations for an individual End User Customer within the Wire Center(s) identified above in this section, market-based rates for the Unbundled Local Switching elements or for the unbundled switching component of the UNE-P service as provided in Exhibit A to this Agreement shall apply.
- 9.11.2.5.7.1 When a CLEC's End User Customer with three (3) lines or fewer served by UNE-P or unbundled switching adds lines so that it has four (4) or more lines, CLEC shall do one of the following regarding the original three (3) Unbundled Local Switching elements or UNE-P lines within sixty (60) days from the date the fourth line is added: 1) CLEC may retain such unbundled switching lines at a market-based rate or retain such UNE-P lines as UNE-P Combinations with a market-based rate for the unbundled switching component shown in Exhibit A of this Agreement; or 2) CLEC shall convert such lines from UNE-P lines or unbundled switching elements to resold services or other appropriate arrangement.

Exhibit A at 9.12 to the Colorado SGAT includes a "place-holder" for market-based rates for UBS, but no rates are included. The following footnote is also included in the Exhibit A:

9. Qwest will utilize the Commission TELRIC ordered rates for this element. However, Qwest reserves the right to implement market-based prices some time in the future pursuant to CC Docket No. 96-98, paragraphs 278-287.

**QUESTION:**

Describe and explain why a CLEC must (re)order DSL when Qwest has disconnected DSL in error (for example, as Eschelon notes, when an end-user's service is converted to UNE-P, Qwest sets a standard due date to re-install the DSL).

**RESPONSE:**

As described in the Lori Simpson Reply Declaration, paragraph 6, the one time when a CLEC is required to order DSL is when an account is converted where the records indicate the customer did not have existing DSL service. In those cases, the request for DSL is treated as a new request for the service and is given the standard interval. As always, the CLEC has the option of requesting an expedited delivery. In cases where the records indicate the customer has the service, no LSR is required if a disconnect in error occurs.

**QUESTION:**

How many lines were affected by the July 18th outage?

**RESPONSE:**

Qwest doesn't know how many lines were affected by the service problem experienced on July 18th by OneEighty's customers in the 406-294 NXX code.

First, it should be clarified that it is misleading to characterize this as an outage. The activation of the Location Routing Number ("LRN") in NeuStar's Number Portability Administration Center's database (i.e., the Western Region NPAC LNP database) would have only affected the termination of calls to the customers served by OneEighty's switch with the 294 NXX code. It would not affect the origination of calls by OneEighty's customers in the 294 NXX code. It also should not have affected the termination of calls originated to those customers internal to OneEighty's switch serving those customers because it would only affect calls that should have been routed to OneEighty's switch based on queries launched to the NPAC database. One Eighty doesn't need to launch a query to the NPAC database to route a call internal to its switch.

In response to the question, Qwest would have no knowledge of how many customers are served by OneEighty's switch. Qwest only has access to the information contained in the industry's Local Exchange Routing Guide ("LERG") which identifies the local exchange carrier ("LEC") that is assigned the NXX or NXX-X code but not the individual numbers assigned within that code. Each LEC is responsible for the administration of the individual telephone numbers within its assigned NXX or NXX-X codes, thus Qwest doesn't know how many of the individual telephone numbers are actually working numbers. Only OneEighty would have the customer account records for the individual telephone numbers.

**QUESTION:**

The alleged cause of the July 18th outage, affecting the 406-294 NXX, was "a Qwest-initiated change in the NPAC database showing all 406-294" numbers as having the LRN of 406-651-1111 (a Qwest LRN) and the company owner as SPID (OCN) 9636, Qwest." Is this true? Are the causes of the July 18th and June 24th outages related?

**RESPONSE:**

The causes of the July 18th and June 24th service problems affecting the 406-294 NXX are directly related. Exhibit MSB-1 is a copy of the NeuStar North American Numbering Plan Administration's ("NANPA") June 25, 2002 letter explaining the mistake it made in processing OneEighty's request. In November 2001, OneEighty requested a change of responsibility for the 406-294 NXX code from Avista to OneEighty which was mistakenly processed by NANPA as a return of a code (i.e., a deactivation of the code



indicating OneEighty had no working customer telephone numbers in that code). As part of the industry guidelines that NANPA follows for returned codes, it will check in NeuStar's number portability database (i.e., the Western Region NPAC database) to determine whether there are numbers that have ported from that NXX code to another LEC. If there are ported numbers, NANPA will request that one of the LECs' with ported numbers become the LERG assignee for the NXX code. NANPA then issues a Central Office Code (NXX) Assignment Request – Part 3 to both the original code holder and to the new code holder. In the Part 3 form, it directs the new code holder, in this case Qwest, to complete a Part 1B-NPAC NXX LERG Assignee Data form to the NPAC (Exhibit MSB-2) which establishes the effective date for the LRN to be activated for the NXX code. It should be noted that all of the ported numbers would have already had the Qwest LRN (or any other LECs' LRNs for their ported numbers) activated. So, theoretically no other numbers were working in the NXX code and should not have been affected by the activation of the NXX code in Qwest's switch or the later activation of the Qwest LRN for the NXX code in NeuStar's NPAC database. The guidelines that NANPA follows can be found by accessing the FCC's North American Numbering Council's website at <http://www.fcc.gov/wcb/tapd/Nanc/> and then the link to the NANPA website (or directly to the NANPA website at [www.nanpa.com/](http://www.nanpa.com/)) for the 5-13 Code Return document. This document is the industry's April 25, 2002 interim procedures for code returns that is an update of guidelines previously addressed in the industry's Central Office Code Administration guidelines.

In NANPA's June 25, 2002 response to Qwest (Exhibit MSB-1), it requested that Qwest cancel its view in the Telcordia Business Integrated Routing and Rating Database System ("BIRRDs") which is the source data for the industry's LERG. NeuStar's letter said it would be responsible for issuing an emergency notification to the industry advising of this change. Qwest immediately made the change to BIRRDs that same day. Qwest assumed that NeuStar's emergency notification to the industry would include notification to NeuStar's Western Region NPAC to also cancel the activation of the Qwest LRN for the 406-294 NXX code, however, that was not the case. Thus, on July 18th, NPAC worked the order activating Qwest's LRN for the 406-294 NXX code.

#### QUESTION:

Did Qwest have specific internal controls in place to prevent the June 25th and July 18th outages? What were those controls? Did those controls fail? How so? Given the proximity of the 2002 outages, is there any evidence to demonstrate that the outages are not symptomatic of a recurring lack of reliability of the portability system?

#### RESPONSE:

Qwest has various processes in place for the activation and testing of new NXX codes that are assigned by NANPA. In this case, the events described above were unique and the errors that were made by NeuStar's NANPA could not have been anticipated by Qwest or any other LEC that might have volunteered to become the LERG assignee for the 406-294 code.

As described above, these were not outages since the customers should have continued to have dial tone because they were served by OneEighty's switch. Qwest's activation of the code in its switch would not have affected the origination of calls by these customers nor the termination of calls to those customers internal to OneEighty's switch. In addition, this was a code assignment error, not a number portability problem. There was no porting of numbers involved. The activation of the LRN in the Western Region's NPAC database is a function associated with being the assignee for the NXX code.

Since these service problems were encountered, Qwest has taken action to work with NANPA and the industry to revise the industry guidelines to prevent these types of problems from occurring in the future. In reviewing the industry's guidelines and based on these recent experiences, Qwest believes that the guidelines do not provide sufficient detail on what actions need to be taken and by whom when a problem is encountered with a code reassignment. Qwest has offered to assist NANPA in preparing a contribution to the Industry Numbering Committee's ("INC") Central Office Code Assignment Working Group to propose changes to the documentation/guidelines, including the interim code return guidelines, that would outline the specific responsibilities of the NANPA before it can request that other carriers assume responsibility for a previously assigned code and what actions NANPA and other parties should take in case there is a problem encountered with the transfer of a code. Internally, Qwest has incorporated a change to its procedures for responding to the NANPA when NANPA requests a carrier become the new code holder for a returned code. This procedure requires that NANPA verify with Qwest, that NANPA has contacted the releasing carrier and confirmed the release of the code to Qwest and confirm that the releasing carrier has no working telephone numbers remaining in the code. Qwest previously assumed that NANPA did that as part of its responsibility for code returns.

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June 25, 2002

Qwest  
Mr. Mike Whaley

Re: NPA-NXX 406-294

Dear Mr. Whaley:

As discussed, below is an explanation of the detail surrounding the reassignment of the above referenced code, 406-294.

In November 2001, NANPA received a request for a change to the code from the LERG assignee, 180 Communications. At that time, NANPA was actively engaged in the development of a process to address the issue of code returns with ported telephone numbers. The NPA-NXX 406-294 was inadvertently reported as a return versus a change. As such, this code was included in a report request to the NPAC for verification of ported telephone numbers. In April 2002, it was noted that we did not have valid porting information on this code, therefore a follow-up report was requested from the NPAC to verify porting. The report received by NANPA identified numbers being ported to Qwest as well as other carriers.

In the time from November 2001 to April 2002, the Federal Communications Commission (FCC) and the Industry Numbering Committee (INC) approved an interim process for NANPA CO Code Administration to follow for return of codes with ported telephone numbers. Once the process was approved, NANPA proceeded with the follow up on previously identified returns in which we had no resolution. This code was included in that follow up.

NANPA proceeded to contact the service providers with ported telephone numbers to inquire if they would be willing to be the new LERG assignee. At that time, Qwest volunteered to become the new LERG assignee. NANPA received a Part 1 from Qwest, and the effective date assigned for the change to Qwest was given an effective date of July 13, 2002.

Today, it was brought to the attention of NANPA that there was call failure occurring on this code. After further research, the aforementioned error was discovered. This code should not have been included in the attempt to find a new LERG assignee as it was not returned by the code holder, 180 Communications. The code should revert back to the original service provider, 180 Communications. Since the effective date of the change to

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Qwest is in the future, July 13, 2002, please cancel the view in the Telcordia database, BIRRDS. NANPA will be responsible for issuing an emergency notification to the industry advising of this change. Please advise when the record has been updated in the BIRRDS system.

In conducting the research, it was discovered another code was reassigned to Qwest in error, NPA-NXX 406-384. This code will need to follow the same process as the 406-294 code.

Please contact me should you have any additional questions or concerns.

Sincerely-

Cheryl Dixon  
Senior Code Administrator  
NANPA CO Code Administration

**Central Office Code (NXX) Assignment Request - Part3**  
**Effective May 18, 1998**

**Code Request Tracking Number: 406-154872**

**Administrator's Response/Confirmation**

Date of Application: May 8, 2002

Date of Receipt: May 8, 2002

Date of Response: May 22, 2002

Effective Date: July 13, 2002

Company/Entity Name: OWEST CORPORATION

Code Administrator Contact Information:

Nancy Cowles

Phone: 9253638772

Signature of Code Administrator

Nancy Cowles

Fax: 9253638734

Name (print)

X NPA: 406

Code Assigned:  
294

Date of NXX Code  
Assignment: \_\_\_\_\_

a. Switch Identification (Switching Entity/POI): BLNGMTWEDS0 Rate Center:  
BILLINGS

b. The Code Administrator is \_\_\_\_\_, is not X responsible for inputting Part 2 information into RDBS and BRIDS.

c. Routing and Rating information complete: Yes \_\_\_\_\_ No X  
Additional RDBS and BRIDS information necessary as follows:  
No

d. To be published in the LERG and TMP by \_\_\_\_\_  
Additional RDBS and BRIDS information needs to be received by the code administrator no later than \_\_\_\_\_

\_\_\_\_\_ Code Reserved: \_\_\_\_\_

Date of Reservation: \_\_\_\_\_

Your code will be honored until \_\_\_\_\_

Switch Identification (Switching Entity / POI): \_\_\_\_\_

\_\_\_\_\_ Form incomplete

Additional information required in the following section(s):  
\_\_\_\_\_

\_\_\_\_\_ Form complete, code request denied

Explanation: \_\_\_\_\_

\_\_\_\_\_ Assignment activity suspended by the administrator

Explanation: \_\_\_\_\_

Further Action: \_\_\_\_\_

X NPA in jeopardy: Yes \_\_\_\_\_ No X

If yes, refer to Section 7 of the assignment guidelines.

Change/Disconnect List:     

Remarks:

SV:5 Transfer of this NXX from 4222 One Eighty Communications, Inc. to 9636 Owest Corporation due to TN's being ported has been approved. Please coordinate this change with the NPAC by completing and forwarding a Part 1B-NPAC NXX LERG Assignee Data form to the NPAC. NOTE: Effective Date is subject to change dependant upon NPAC volume. You will be contacted by NPAC if applicable.